

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
INC.,)	
)	
Defendants.)	

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;)	
MICRON SEMICONDUCTOR)	
PRODUCTS, INC.; MICRON)	
TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S
SUR-REPLY TO SAMSUNG'S MOTION TO STRIKE EXPERT TESTIMONY
OF DR. ANDREAS GROEHN (DKT. 348)**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Sur-Reply to Samsung’s Motion to Strike Expert Testimony of Dr. Andreas Groehn. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 5** is a true and correct excerpted copy of the Initial Expert Report of Joseph McAlexander, dated November 20, 2023.

3. Attached as **Exhibit 6** is a true and correct excerpted copy of the February 9, 2023 deposition transcript of Joseph McAlexander, taken in Civil Case No. 21-CV-463-JRG.

4. Attached as **Exhibit 7** is a true and correct excerpted copy of the Rebuttal Expert Report of Lauren R. Kindler, dated December 21, 2023.

5. Attached as **Exhibit 8** is a true and correct excerpted copy of the transcript of the January 8, 2024 deposition of Dr. Andreas Groehn, taken in Civil Case No. 22-CV-293-JRG.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 14, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby